

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JILL STEIN and LOUIS NOVAK,

Plaintiffs,

No. 2:16-cv-14233-MAG-EAS

v.

CHRISTOPHER THOMAS, in his official  
capacity as Director of Elections; and  
JEANETTE BRADSHAW, NORMAN D.  
SHINKLE, JULIE MATUZAK, and COLLEEN  
PERO, in Their Official Capacities as Members  
of the Board of State Canvassers,

Defendants.

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**MOTION FOR A TEMPORARY RESTRAINING ORDER AND A PRELIMINARY  
INJUNCTION ENJOINING THE DELAY OF THE STATEWIDE RECOUNT OF THE  
2016 PRESIDENTIAL ELECTION**

NOW COME THE PLAINTIFFS, based upon their Memorandum of Law in Support of Plaintiffs' Motion for a Temporary Restraining Order and Preliminary Injunction, and the Declaration Mark Brewer and exhibits thereto, dated December 2, 2016, and, by their counsel, move this Court at the Theodore Levin U.S. Courthouse, 231 W. Lafayette Blvd., Detroit Michigan, for a temporary restraining order and preliminary injunction, pursuant to Federal Rule of Civil Procedure 65, enjoining the Defendants, their agents, officers and employees, and all persons acting in concert or cooperation with them from further delaying recount proceedings for the 2016 presidential election.

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Dated: December 2, 2016  
Detroit, Michigan

GOODMAN ACKER, P.C.

/s/ Mark Brewer

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